

STATEMENT OF BASIS

US DEPARTMENT OF AGRICULTURE, FOREST SERVICE QUINULT WORK CENTER STATE WASTE DISCHARGE PERMIT NO. ST 6091

The purpose of this Statement of Basis is to explain the need to modify Sections S2.B, S5.H, and S9 of the permit.

I. GENERAL INFORMATION

- A. Permittee: US Department of Agriculture, Forest Service
1835 Black Lake Boulevard Southwest, Suite A
Olympia, WA 98512-5623
- B. Plant Location: Quinault Work Center
Falls Creek Road
Quinault, WA
- B. Discharge Locations: Ground
Latitude: 47° 28' 16" N
Longitude: -123° 50' 37" W

II. REQUEST FOR MODIFICATION:

The United States Forest Service (USFS) had planned to have a new wastewater treatment facility operational in 2006, install a new monitoring well drilled in 2007, begin monitoring groundwater in several new wells on a quarterly basis, and abandon older, existing wells. However, the treatment plant will not be on-line until some time in 2008, and several of the new wells are dry during parts of the year.

This permit modification:

- Delays implementation of permit conditions that are predicated on completion of the treatment plant; and
- Requires the USFS to monitor groundwater levels monthly and make recommendations for establishing new wells and abandoning old wells following development of better data on groundwater levels.

This Statement of Basis will serve as an amendment to the Fact Sheet and Permit.

APPENDIX A – RESPONSE TO COMMENTS

We received e-mailed comments from Jessica Baca of the United States Forest Service on April 22, 2008.

Comment 1:

The USFS supports the permit revisions and is interested in analyzing the groundwater data - specifically to better monitor total coliform. The USFS is interested in exploring three options for monitoring total coliform once groundwater data is collected:

1. A different point of compliance for sampling - such as sampling the effluent prior to discharge into the drainfields;
2. A more flexible enforcement limit than 1cfu/100ml if monitoring wells are used; or
3. A deletion of the total coliform requirement should the groundwater data and new plant operation support this option.

Response 1:

We modified the permit to delay implementation of groundwater quality enforcement limits. Instead, by June 30, 2001, the Permittee will submit to the Department a report that:

- a) Describes the data and information on well construction, static water level and groundwater quality from the existing wells;
- b) Makes recommendations on abandonment of existing wells, installation of new wells, and designation of wells as up-gradient (background) and down-gradient (compliance) monitoring points; and
- c) Includes a schedule to abandon and install wells, as recommended.

Following submittal of this report and installation of new wells, the Department will modify this permit to designate wells as points of compliance – that is, as locations where water quality must meet the groundwater quality enforcement limits of Section S1.B of this permit. (See permit section S9).

Comment 2:

Please clarify what portion(s) of the plant Operation and Maintenance Manuals the Department wishes to receive. The treatment plant and lift station O&M manuals are very voluminous and require approximately 8 feet of shelf space. The USFS is willing to

provide the entire set of O&M manuals but want to make sure the Department of Ecology is aware of the size.

Response 2:

We modified the permit to require the Permittee to retain the O&M Manuals on site, rather than submitting them to the Department of Ecology.